EPA/ESD/R08-00/564
2000

EPA Superfund
Explanation of Significant Differences:

OGDEN DEFENSE DEPOT (DLA)
EPA ID: UT9210020922
OU 01
OGDEN, UT
09/13/2000

DEFENSE LOGISTICS AGENCY
DEFENSE DISTRIBUTION DEPOT HILL
5851 F AVENUE, BUILDING 849
HILL AIR FORCE BASE, UT 84056-5713

SEP 13 2000

DDHU-D

Ms. Judith McCulley
EPA Region VIII
Denver Place, Suite 500
999 18th Street
Denver, CO 80202-2466

Dear Ms. McCulley:

Defense Distribution Depot Hill (DDHU) has prepared an Explanation of Significant Difference (ESD) for Operable Unit 1 (OU1) to explain the significant difference between the soil remediation cleanup level, the costs associated with cleanup, and the increased amount of soil excavated from the old Plain City Canal as listed in the Record of Decision for OU1. The remedy as revised in the ESD, complies with the National Contingency Plan (NCP) and the statutory requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980. This ESD was prepared in fulfillment of the public participation responsibilities under Section 117(c) of CERCLA, 42 USC 9601 et seq. as amended by the Superfund Amendments and Reauthorized Act of 1986 ("SARA") and Section 300.435(c)(2)(I) of the NCP, 40 CFR Part 300.

DDHU published a notice in a local newspaper on July 23, 2000 that described the ESD and its availability for review at the DDHU repository. This ESD and all documents that support the changes are contained in the Administrative Record for the DDHU site. The Administrative Record is available for review at the Environmental Protection Office at the former DDOU from 8:00 a.m. to 3:00 p.m., Monday through Friday. Anyone interested in viewing the ESD and the supporting information may contact Mr. Ronald Smith by phone at (801)399-7629 or his mailing address is DDHU-DE (ATTN: Ron Smith), 375 W. Ward Avenue, Ogden, Utah 84404.

If you need any further information concerning this ESD, request you contact Mr. Ronald Smith of my Environmental Office at the above listed phone number.

Sincerely,

JOSEPH W. ROBLES
Acting Commander

EXPLANATION OF SIGNIFICANT DIFFERENCE
TO
RECORD OF DECISION
FOR
OPERABLE UNIT 1

JULY 2000

EXPLANATION OF SIGNIFICANT DIFFERENCE

OPERABLE UNIT #1

OVERVIEW

The purpose of this document is to explain the significant difference between the soil remediation cleanup level, the costs associated with cleanup, and the increased amount of soil excavated from the old Plain City Canal as listed in the Record of Decision (ROD) for Operable Unit (OU 1) signed by the U.S. Environmental Protection Agency, Region VIII (EPA, the Utah Department of Environmental Quality (UDEQ) and Defense Distribution Depot Ogden (DDOU) in June 1992. The Depot was the lead agency at the Site, with oversight assistance from EPA and UDEQ.

The Site is currently in the remedial action phase of the Superfund cleanup process. Since design activities began, subsequent to the signing of the 1992 ROD for OU1, new information has been obtained which has resulted in the need for this Explanation of Significant Differences (ESD).

This ESD provides a brief background of the Site and describes the original remedy selected in the 1992 ROD. The ESD also explains how the original remedy has been changed.

This ESD is prepared in fulfillment of the public participation responsibilities under Section 117 (c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 USC 9601 et seq. (CERCLA, more commonly referred to as Superfund), as amended by the Superfund Amendments and Reauthorized Act of 1986 ("SARA") and Section 300.435(c)(2)(I) of the National Contingency Plan, 40 CFR Part 300 ("NCP").

ADMINISTRATIVE RECORD

Complete documentation of the Explanation of Significant Difference is in the Administrative Files, which are available for review at the Environmental Protection Office at the former DDOU from 8:00 a.m. to 3:00 p.m., Monday through Friday.

SITE NAME, LOCATION, AND DESCRIPTION

The former Defense Distribution Depot (DDOU) is located at 500 West 12th Street along the original right-of-way of the Central Pacific Railroad in the northern reaches of the City of Ogden, Weber County, Utah. The Utah General Depot was originally activated on September 15, 1941 and later renamed the Defense Depot Ogden, Utah. The Depot was closed due to Base Realignment and Closure (BRAC) in September 1997. The former Depot has been leased to the City of Ogden and the property will eventually be transferred to them.

The former Depot is situated in a semi-rural setting with the small communities of Harrisville to the north, Farr West to the west, and numerous small ranches and business located to the west. It is drained by the Mill and Four-Mile Creek, both of which traverse the installation from east to west.

In the past, both liquid and solid materials were disposed of at DDOU. Oily liquid materials and combustible solvents were incinerated in burning pits, and solid materials were buried, burned or taken off site for disposal. Several waste disposal areas have been identified on property that was formerly controlled by DDOU. The six different waste disposal areas at DDOU were divided into four operable units. Under the National Contingency Plan (NCP), "An operable unit is a discrete part of a remedial action that can function independently as a unit and contributes to preventing or minimizing a release or threat of a release."

In the original ROD, it stated that Operable Unit 1, which is located in the southwest part of the Depot, was composed of the backfill material in the Plain City Canal where it entered the Depot at the South, Burial Site 1, and Burial Site 3-B. Of the three potential sources of contamination at OU 1, only the backfill in the Plain City Canal in the southwest part of the Depot was identified as a source of ground water contamination. Backfill in the Plain City Canal consisted of glass, ash, charcoal asphalt, partially burned plastic-coated electrical wire, wood, concrete, plastic, and metal fragments mixed with silty sand and gravel. Analysis of soil samples revealed that the soil in the Plain City Canal had been contaminated with polychlorinated biphenyls (PCBs), dioxins, and furans. The proposed remedy was off-site disposal of contaminated soil and debris and on-site treatment of the groundwater using air stripping. The soil removal action was completed in August 1994 and the treatment of groundwater began in December 1994.

Because of BRAC closure, the Depot was required to do further environmental site investigations before the Depot could be turned over to the City of Ogden. In the BRAC Site Investigation Report, the Plain City Canal was identified as requiring further investigation prior to ownership transfer. During this investigation, it was discovered that there was additional soil contamination in the Plain City Canal further to the north of the original soil cleanup action at OU1. It was decided by EPA, Utah Department of Environmental Quality and DDOU to investigate the entire length of the Plain City Canal where it has originally flowed through the Depot. Thirteen separate areas along the canal were identified from the Plain City Canal Remedial Investigation Report as requiring remediation.

BASIS FOR THE DOCUMENT

The ROD for OU1 was signed in June 1992. In the ROD, DDOU agreed to remediate the soil to residential standards. The residential standard was chosen prior to the base closure because the future land use at the time was not known. Now there is a known reuse master plan by Ogden City for industrial use only. This ESD will show that changing the cleanup

levels to industrial standards will be within the allowable risk range of Superfund law. See attached Table 2-1 for Remedial Cleanup Goals for soils that were used

In the ROD, the volume of contaminated soil and debris in the Plain City Canal was estimated at 6,000 tons, based on a length of approximately 1,200 feet, 20 feet wide and contaminated soil thickness of 4 feet. The actual volume of contaminated soil and debris removed was 8,951 tons. The contaminated soil that was removed from the Plain City Canal was at the southern part of OU1. During the BRAC Site Investigation, it was discovered that there was additional contamination in the Plain City Canal further to the north. Thirteen separate areas along the canal were identified from the Plain City Canal Remedial Investigation Report as requiring remediation. The initial excavation boundaries were set at least 37.5 feet along the axis of the canal from designated potholes with sample results above the cleanup levels. The total linear length excavated was approximately 2,250 feet. The top six inches of clean overburden were first removed and stockpiled along the side of the excavations. Soil and debris were removed down to a depth of approximately 5 feet below ground surface and approximately 20 to 24 feet across the width of the canal. The total amount of soil excavated and removed off-site during this remedial action was 5,670 tons. This makes a total of 14,621 tons of soil and debris removed from the Plain City Canal. Debris encountered during remedial excavation activities were segregated, tested for underlying hazardous constituents, and disposed of in accordance with the classification of the materials. Following remedial activities, the work areas were restored to previously existing conditions.

In the original ROD, the cost of the remediation project was estimated at approximately 2.2 million dollars. The actual cost was closer to 4 million dollars. Because of the increased soil removal, the cost projected for the cleanup of OU1 increased by 3 million dollars. The total cost for cleanup at OU1 was approximately 7 million dollars.

DESCRIPTION OF SIGNIFICANT DIFFERENCES

Changing the remedial action objective (RAO) from Residential Cleanup Standards to Industrial Cleanup Standards (i.e. Lead from 500 mg/kg to 1,850 mg//kg) will not pose a risk to receptors under industrial land uses. The original OU1 area was relatively small and was cleaned up to residential standards because the future land use at the time was not known. Such cleanup did not require any institutional controls. Now the former DDOU has been leased to the City of Ogden and their master reuse plan calls for commercial/industrial use with no residential development. Because of the known future land use and relatively large area which would require remediation (at a substantial cost), the cleanup to industrial standards became appropriate and cost effective. Protection of human health will be further achieved through implementation of institutional controls. When the property is transferred, the deed will contain restrictions preventing residential development of the site. The remedial objective for the Plain City Canal cleanup action was to reduce the potential threats posed by contaminated soil that may occur as a result of future exposure to onsite workers. Thirteen separate areas along the length of the canal were identified in the Plain City Canal Remedial Work Plan as requiring remedial action. The selected remedy for the Plain City Canal remedial action was the removal and off-site disposal of soil and debris containing

constituents of concern above risk-based remedial goals under industrial land uses. Under this remedial alternative, the residual risk was minimized because the industrial remedial goals were achieved through removal and off-site disposal. In addition, the overall volume of contaminated media was reduced through the removal of contaminated soil and debris. Analytical results indicated that remedial actions had successfully removed substances that posed a potential threat to human health and the environment and that the objectives of the remedial design had been accomplished. In summary, the results indicated that (a) the sources identified during the Remedial Investigation had been removed or reduced to industrial land use levels; (b) the site had been adequately characterized; (c) no ground water impacts existed; and (d) the sites did not pose a risk to receptors under industrial land uses.

STATUTORY DETERMINATIONS

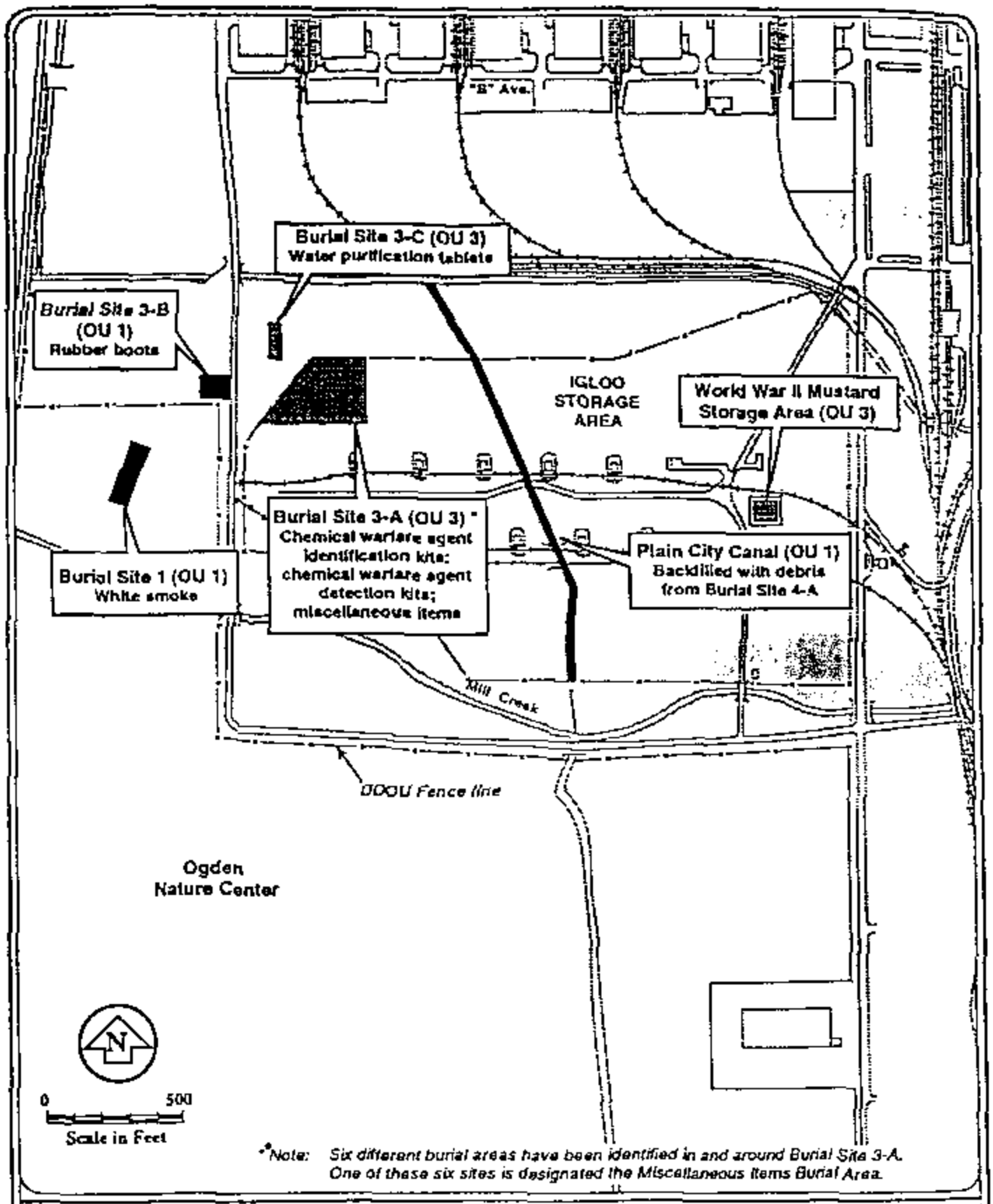
DDHU believes that the modified remedy satisfies CERCLA Section 121 as the remedy remains protective of human health and the environment, complies with federal and state requirements that were identified in the ROD as applicable or relevant and appropriate to this remedial action. In addition, the revised remedy uses permanent solutions to the maximum extent practical for this site. The change contained herein is significant, but does not fundamentally change the remedy.

PUBLIC PARTICIPATION COMPLIANCE

DDHU has presented these changes to the original ROD in the form of an ESD because the changes are of a significant but not fundamental nature. DDHU will publish a notice in a local newspaper that describes this ESD and its availability for review at the DDHU repository. This ESD and all documents that support the changes herein are contained in the Administrative Record for the DDHU site. Anyone interested in viewing the ESD and the supporting information may contact the Environmental Office at the former DDOU. The point of contact for all environmental restoration matters is Mr. Ron Smith. His phone number is (801)399-7629 and his mailing address is DDHU-DE (ATTN: Ron Smith), 375 S. Ward Avenue, Ogden, Utah 84404.

STATE CONTACT:
Muhammed Slam
Utah Dept of Env Quality
168 N. 1950 W., 1st Floor
SLC, UT 84416-0700

EPA CONTACT:
Judith McCulley
EPA, Region VIII
999 18th Street, Suite 500
Denver, CO 80202-2466



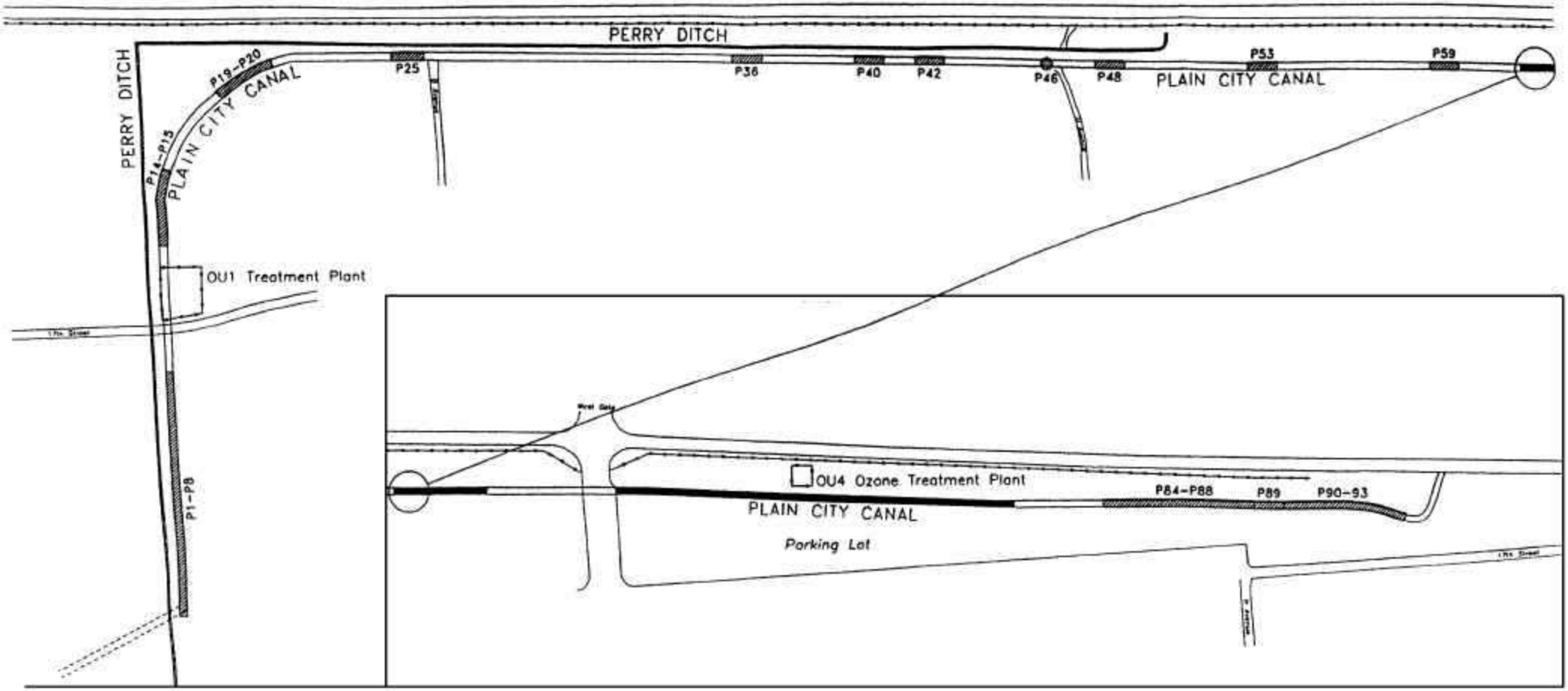
ACCI

WASTE DISPOSAL AREAS
OPERABLE UNITS 1 and 3

Source: "Remedial Design Report For Operable Unit One",
James M. Montgomery Consulting Engineers, Inc., February, 1993

FIGURE 2

ORIGINAL REMEDIATION SITE FOR PLAIN CITY CANAL AS STATED IN ROD



NEW AREA OF EXCAVATION OF PLAIN CITY CANAL

PROOF OF PUBLICATION

STATE OF UTAH,
County of Weber, } ss.

CP GARCIA being first duly sworn, deposes and says:

That she/he is a citizen of the United States, over the age of eighteen years, and not interested in the above entitles matter; that she/he is the principal clerk of the Standard-Examiner, which is, and was at the times of publication hereinafter mentioned a newspaper of general circulation in the counties of Weber, Davis, Box Elder, & Morgan, State of Utah: printed and published daily therein at Ogden City, that the notice attached hereto

EXPLANATION OF SIGNIFICANT DIFFERENCE

Was published in said newspaper 1 TIME

first, on the 23RD day of JULY 2000
and last on the day of 2000
that said notice was published in every number of the regular issue of the said newspaper at times of publication as above specified. CPGarcia

Subscribed and sworn to before me this 26TH day of JULY A.D., 2000

Jayne Dunn
Notary Public

JAYNE DUNN
NOTARY PUBLIC • STATE of UTAH
455 - 23RD STREET
OGDEN UT 84401
COMM. EXP. 03-05-2002

DEFENSE DISTRIBUTION DEPOT HILL ANNOUNCES THE AVAILABILITY OF THE EXPLANATION OF SIGNIFICANT DIFFERENCE TO THE OPERABLE UNIT 1 RECORD OF DECISION.

Defense Distribution Depot Hill is announcing the changes made to the Record of Decision for Operable Unit 1 of the former Defense Distribution Depot Ogden (DDOU). The specific changes are: (1) The soil remediation cleanup levels were changed from residential cleanup standards to industrial cleanup standards; (2) The costs associated with the cleanup were increased from the original estimate. Complete documentation of the Explanation of Significant Difference is in the Administrative Files, which are available for review at the Environmental Protection Office in Building 1 at the former DDOU from 8:00 a.m. to 3:00 p.m., Monday through Friday, except holidays. For further information contact: DDHU: Ron Smith (801)399-7628 EPA: Judith McCulley (303) 312-6667 UDEQ: Muhammad Slam (801) 536-4100

Pub. July 23, 2000 000-16352

Table 2-1
Remedial Goals For Soils
Plain City Canal – DDHU Ogden, Utah

Analyte	Cleanup Goal[1] (mg/kg)
Alpha-Chlordane	16
Benzo(a)pyrene	0.78
Dieldrin	0.36
Lead	1,850
PCB	25
TPH-g	3,000

[1] Cleanup goals:

- The proposed remedial cleanup goals for alpha-chlordane, benzo(a)pyrene, and dieldrin are based on the USEPA Region III Risk-Based Concentrations for Industrial Land Uses (USEPA, 1998). These concentrations correspond to a carcinogenic risk of 1×10^{-6}.
- Lead is based on the adult blood uptake model and is protective of working adults of childbearing ages (ICF Kaiser, 1999b).
- PCB-l242 was the only PCB isomer detected above the screening criteria during the recent site investigation. The cleanup level of 25 mg/kg is based on total PCBs and is based on the existing DDHU Record of Decision (ROD) remedial cleanup levels for OU1 and OU4.
- TPH-g is an estimated site-specific target level (SSTL) using the indicator/surrogate approach as recommended by the Massachusetts Department of Environmental Protection and the TPH Criteria Working Group. These levels are derived using fraction-specific physical/chemical characteristics and toxicity information and are based on the exposure pathways of soil ingestion, dermal contact, inhalation of volatile organic compounds in indoor air, and inhalation of particulates in ambient air.